

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

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[Related to Docket #18502; Amending 18821 and 18652]

**SECOND AMENDED PRETRIAL INFORMATIVE MOTION – NOVEMBER 1, 2021
PRETRIAL CONFERENCE AND NOVEMBER 8, 2021 CONFIRMATION HEARING**

Dated: October 27, 2021

**AMENDED PRETRIAL INFORMATIVE MOTION – NOVEMBER 1, 2021
PRETRIAL CONFERENCE AND NOVEMBER 8, 2021 CONFIRMATION HEARING**

[#18821 is being re-filed (1) to add docket entries for exhibits on attachment C-2 to Exhibit C, and (2) since letters have now been used for exhibits per #18749-page-3-of-4, to show the exhibit numbers previously used in #18758, #18708 and #18648. I also clarify that Exs. JJ and AAA are being offered as declarations (listed on #18648-page-12-of-13), not exhibits.]

Peter C. Hein, pro se, an individual bondholder, previously filed an Informative Motion (#18652) in accordance with the Court's Order regarding Procedures (#18502). In #18652, I requested an opportunity to be heard at the November 1, 2021 pretrial conference and also requested the opportunity to present opening argument in opposition to confirmation at the November 8, 2021 confirmation hearing. The Party Appearance Cover Sheet is attached as Exhibit A to #18652 is again attached. No changes have been made in Exhibit A.

An amended Party Witness Cover Sheet is attached as Exhibit B and an Amended Party Exhibit Cover Sheet is attached as Exhibit C. If I correct or if I further update Exhibit B or C, I will file a further amended informative motion. Exhibits have been identified in the exhibit list filings I made (#18708 and #18648), as per #18394. I have also filed a further amended exhibit list and the exhibits listed on it in #18758, #18759, #18760, #18761, #18763 and #18764 in response to #18749. Per #18749-page-3-of-4, the exhibits filed have been identified in the form "Hein A", etc. and the "Hein A" etc. convention has been adopted for the Amended Party Exhibit Cover Sheet included as an attachment to Exhibit C of this filing.

October 27, 2021

Respectfully Submitted,

/s/ Peter C. Hein

Peter C. Hein, pro se
101 Central Park West, Apt. 14E
New York, NY 10023
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917-539-8487

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	Peter C. Hein
Party Name Abbreviation (For Use with Zoom)	Pro se / Hein, Peter
<p>Omnibus Hearing Participant</p> <p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number and • Docket Entry No. for the Attorney's Notice of <p>Or</p> <p>Individual Party-in-interest Not Represented by Counsel:</p> <ul style="list-style-type: none"> • Name, Email, Phone Number, Proof of Claim Number (if any) 	<p>Peter C. Hein</p> <p>petercheinsr@gmail.com</p> <p>9175398487</p> <p>Claim 10696</p>
Plan Objection Docket Entry No.	18575; 18181
If a Party files a supplemental Party appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
<p>Note: Pursuant to the Hearing Procedures Order ¶ 2, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.</p>	

NOTE: This Party Appearance Sheet applies to both the November 1 Pretrial Conference and the November 8, 2021 Confirmation Hearing.

EXHIBIT B
AMENDED PARTY WITNESS COVER SHEET

Name of Party: Peter C. Hein			Peter C. Hein
Does the Party intend to offer a witness?			Witness declarations being offered by me (all previously filed) were identified in #18648-page-12-of-13, filed 10/22/2021. Apart from offering such declarations, I do not contemplate offering an affirmative live witness at this time, but I reserve all rights. I request an opportunity to cross-examine the witnesses listed on Attachment B-1 hereto.
Total Number of Witnesses			
Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)*	Scope of Testimony
I, <i>[insert filing attorney name or pro se party-in-interest]</i> , certify that I have attached each evidentiary document referenced by the above-identified party as a separate exhibit to this cover letter.			

Attachment B-1 to Exhibit B

I have reviewed the declarations FOMB began filing on October 25, 2021, beginning shortly after 9:00 p.m., and continuing until 11:48 p.m. Based on that review, I request an opportunity to cross examine the following witnesses. I have specific questions for each witness, but the time requests take into account that I cannot predict how directly responsive a witness may be.

Witness	Areas for cross	Time requested
Brownstein (#18726)	Tax-exempt status Treatment of Retail bond claims and Puerto Rico Investor election option	30 minutes
Wolfe (#18725)	Puerto Rico's ability to pay debt service	30 minutes
Murray (#18724)	Opinions #1, #2 and #4	45 minutes
Zelin (#18734)	PSA fees provided for in Plan Scope of releases Amounts of debt service due Objection to Testimony: Mr. Zelin states that in light of the "Mediation Agreement" and the associated privilege and prohibition on disclosing the contents of specific negotiations he will not testify to such matters. #18734-page-9-¶18,page-10-¶21-of-49. In addition, FOMB and AAFAF objected to providing discovery concerning what occurred in the settlement and mediation process. #18575-page-276-to-277,283-to-285-of-303. I accordingly object to Mr. Zelin characterizing the settlement discussions (e.g. #18734-page-10-¶20-of-49 ("robust discussion")) and testifying about the settlement process.	30 minutes

Witness	Areas for cross	Time requested
Shah (#18730)	Best interest test analysis and report	30 minutes
Jaresko (#18729)	<p>Plan treatment of priorities and liens</p> <p>FOMB fiscal plan and Commonwealth capacity to pay debt service</p> <p>Release provisions</p> <p>Objections to testimony: I object (1) to Ms. Jaresko testifying to evaluations of legal claims as beyond her expertise and inappropriate since FOMB asserts privilege, and (2) to Ms. Jaresko testifying to, or characterizing, the settlement discussions and process, as to which a mediation privilege is claimed and as to which discovery was refused. <i>See</i> #18575-page-276-to-277,283-to-285-of-303.</p>	20 minutes
Malhotra (#18738)	<p>Amounts of debt service and Puerto Rico's ability to pay debt service</p> <p>Amount payable if excess cash surplus exceeds \$100 million</p> <p>Medicaid funding amounts</p>	20 minutes
Santambrogio (#18736)	<p>Amounts that would be saved based on different minimum monthly benefit levels subject to reduction</p> <p>Amounts payable if excess cash surplus exceeds \$100 million</p> <p>Financial effect of AFSCME CBA changes</p>	20 minutes
Levy (#18737)	<p>Savings from pension measures in the Plan</p> <p>Treatment of post-petition pension payments</p> <p>Treatment of post-petition pension accruals</p>	20 minutes

Witness	Areas for cross	Time requested
Chepenik (#18735)	Practices with respect to budget stabilization, “rainy day”, emergency and revolving funds, and levels of such funds proposed for Commonwealth	15 minutes
Skeel (#18731)	Objection to testimony: I object to Mr. Skeel testifying to, or characterizing, the settlement discussions and process, as to which a mediation privilege is claimed and as to which discovery was refused. <i>See</i> #18575-page-276-to-277,283-to-285-of-303.	

I can be generally available on the dates the Court has reserved for the confirmation hearing, but I do have conflicts on three of the dates. I am **not** available on November 9 from 11:30 a.m. to 2:30 p.m., on November 12 after 11 a.m., and on November 22 after 4 p.m., and I respectfully request that my unavailability at those times be factored into scheduling of matters I am involved in.

EXHIBIT C
AMENDED PARTY EXHIBIT COVER SHEET

Name of Party: Peter C. Hein		Peter C. Hein
Does the Party intend to offer evidence?		Yes
Total Number of Exhibits Offered by the Party		87
Exhibit Identifier	Docket Entry No.	Description of Exhibit
See Attachments C-1 and C-2		
*If a Party files a supplemental Exhibit Cover Sheet, the Party must include the Docket Entry No. of the original exhibit cover sheet in the new filing which must be clearly marked as a "Supplemental" Exhibit Cover Sheet filing.		
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		
I, <i>[insert filing attorney name or name of Pro Se Party in Interest]</i> , certify that I have attached each evidentiary document listed above as a separate exhibit to this cover sheet.		

Attachment C-1 to Exhibit C

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. A [previously Ex. 1]	#18758-1 (also #9508-2)	Official Statement for Series 2012A Commonwealth General Obligation Bonds (excerpts)[This set of excerpts are cited in #18575]
Hein Ex. B [previously Ex. 2]	#18758-2 (also #18575-page-77-to-106-of-303 (Exhibit A to #18575))	Official Statement for Public Building Authority bonds Series Q (excerpts)
Hein Ex. C [previously Ex. 3]	#18758-3 (also #7961-1-page-6-to-8-of-71)	Screenshot taken 6/24/2019 from Puerto Rico “Investor Resources” website for Commonwealth of Puerto Rico
Hein Ex. D [previously Ex. 4]	#18758-4 (also #10029-5)	Screenshot taken 1/9/2020 of Puerto Rico “Investor Resources” webpage for Commonwealth of Puerto Rico
Hein Ex. E [previously Ex. 5]	#18758-5 (also #18575-page-107-to-126-of-303 (Exhibit B to #18575))	Kobre & Kim August 20, 2018 report (excerpts)
Hein Ex. F [previously Ex. 6]	#18758-6 (also #18575-page-127-to-137-of-303 (Exhibit C to #18575))	Summary of bank account balances for the Commonwealth of Puerto Rico and its instrumentalities, information as of August 31, 2021, dated September 30, 2021 (excerpts)
Hein Ex. G [previously Ex. 7]	#18758-7 (also #18575-page-138-to-153-of-303 (Exhibit D to #18575))	Puerto Rico Department of the Treasury, Treasury single account, FY 2022 cash flow as of October 1, 2021 (excerpts)
Hein Ex. H [previously Ex. 8]	#18759-1 (also #18181-page-26-to-64-of-157 (Ex. A to #18181); also in record at #17628-8)	Commonwealth 4/23/2021 fiscal plan, certified by FOMB (excerpts)
Hein Ex. I [previously Ex. 9]	#18759-2 (also #15988-5-page-2-of-272 and #18181-page-65-to-102-of-157 (Ex. B to #18181); also in record at #15988-5)	Commonwealth 5/27/2020 fiscal plan, certified by FOMB (excerpts)

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. J [previously Ex. 10]	#18759-3 (also #18181-page-103-to-105-of-157)	United States Census “quick facts” Puerto Rico
Hein Ex. K [previously Ex. 11]	#18759-4 (also #18181-page-106-to-121-of-157)	TSA FY 2021 cash flow, for month of June FY21 and Q421 (excerpts)
Hein Ex. L [previously Ex. 12]	#18759-5 (also #18575-page-154-to-157-of-303 (Exhibit E to #18575))	FAFAA PayGo and individual contribution debt by entity, June 30, 2018 (excerpts)
Hein Ex. M [previously Ex. 13]	#18759-6 (also #18575-page-158-to-160-of-303 (Exhibit F to #18575))	FAFAA PayGo and individual contribution debt by entity, August 15, 2019 (excerpts)
Hein Ex. N [previously Ex. 14]	#18759-7 (also #18575-page-161-to-164-of-303 (Exhibit G))	FAFAA PayGo and individual contribution debt by entity, for the month of June FY2020 (excerpts)
Hein Ex. O [previously Ex. 15]	#18759-8 (also #18575-page-165-to-168-of-303 (Exhibit H))	FAFAA PayGo and individual contribution debt by entity, for the month of June FY2021 (excerpts)
Hein Ex. P [previously Ex. 16]	#18759-9 (also #18575-page-169-of-303 (Exhibit I))	CRIM summary of current year tax billings vs. current year tax collections
Hein Ex. Q [previously Ex. 17]	#18759-10 (also #18575-page-171-to-172-of-303 (Exhibit K))	Commonwealth of Puerto Rico, update on fiscal and economic progress, FY 2014 Q1 Investor Webcast-October 15, 2013 (excerpts)
Hein Ex. R [previously Ex. 18]	#18760-1 (also #18575-page-173-to-177-of-303 (Exhibit L))	Commonwealth of Puerto Rico tax reform assessment project, executive summary, October 31, 2014 (excerpts)
Hein Ex. S [previously Ex. 19]	#18760-2 (also #18575-page-178-to-182-of-303 (Exhibit M))	Screenshots from invest Puerto Rico website re Puerto Rico tax incentives
Hein Ex. T [previously Ex. 20]	#18760-3 (also #18575-page-183-to-187-of-303 (Exhibit N))	FAFAA, “prepared for the FOMB”, requirement 2(G), Office of the Administration and Transformation of Human Resources, Attendance Report, as of October 2020

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. U [previously Ex. 21]	#18760-4 (also #18575-page-188-of-303 (Exhibit O))	Screenshot from Puerto Rico comptroller contract registry showing 9789 advertising, representation and artistic services contracts
Hein Ex. V [previously Ex. 22]	#18760-5 (also #18575-page-189-to-190-of-303 (Exhibit P))	Excerpts from Excel spreadsheet downloaded from Puerto Rico comptroller contract registry, showing dollar amount of advertising, representation or artistic services contracts of \$301,418,709.56
Hein Ex. W [previously Ex. 23]	#18760-6 (also #18575-page-191-of-303 (Exhibit Q))	Screenshot from Puerto Rico comptroller contract registry showing 9918 consulting services contracts
Hein Ex. X [previously Ex. 24]	#18760-7 (also #18575-page-192-to-194-of-303 (Exhibit R))	Excerpts from Excel spreadsheet downloaded from Puerto Rico comptroller contract registry showing aggregate dollar value of consulting services contracts of \$2,375,668,318.52
Hein Ex. Y [previously Ex. 25]	#18760-8 (also #18575-page-195-of-303 (Exhibit S))	List of Christmas bonuses paid produced by AAFAF
Hein Ex. Z [previously Ex. 26]	#18760-9 (also #18575-page-196-to-197-of-303 (Exhibit T))	World Bank doing business 2017 (excerpt)
Hein Ex. AA [previously Ex. 27]	#18760-10 (also #18575-page-198-to-199-of-303 (Exhibit U))	World Bank doing business 2020 (excerpt)
Hein Ex. BB [previously Ex. 28]	#18760-11 (also #18575-page-200-to-202-of-303 (Exhibit V))	Letter from FOMB dated 10/14/2021 to Gov. Pierluisi, President of Senate of Puerto Rico and Speaker of the House of Representatives of Puerto Rico
Hein Ex. CC [previously Ex. 29]	#18760-12 (also #18575-page-203-to-204-of-303 (Exhibit W))	FOMB 10/8/2021 statement
Hein Ex. DD [previously Ex. 30]	#18760-13 (also #18575-page-215-to-216-of-303 (Exhibit AA))	FOMB 10/12/2021 letter to Secretary of Department of Treasury, Government of Puerto Rico

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. EE [previously Ex. 31]	#18760-14 (also #18575-page-217-to-219-of-303 (Exhibit BB))	Puerto Rico tax expenditure report for tax year 2018 (excerpts)
Hein Ex. FF [previously Ex. 32]	#18760-15 (also #18575-page-220-to-227-of-303 (Exhibit CC))	FAFAA Puerto Rico Department of Treasury, Treasury single account, FY2018 cash flow (as of June 29, 2018) (excerpts)
Hein Ex. GG [previously Ex. 33]	#18760-16 (also #18575-page-228-to-243-of-303 (Exhibit D))	FAFAA Puerto Rico Department of Treasury, Treasury single account, FY2021 cash flow for the month of June FY21 and Q4 FY21 (excerpts)
Hein Ex. HH [previously Ex. 34]	#18760-17 (also #18575-page-244-to-250-of-303 (Exhibit EE))	10/7/2021 Voluntary Corporate Action notice from Merrill regarding CUSIP 74514LB63 (redacted)
Hein Ex. II [previously Ex. 35]	#18760-18 (also #18575-page-251-to-256-of-303 (Exhibit FF))	Notice dated 10/1/2021 from Merrill with respect to CUSIP 74514LB63 (redacted)
Hein Ex. JJ [previously Ex. 36]	#18760-19 (also #18575-page-257-to-260-of-303 (Exhibit GG))	Declaration of Mark Elliott dated 10/15/201 [offered as declaration per #18648-page-12-of-13; not offered as exhibit]
Hein Ex. KK [previously Ex. 37]	#18760-20 (also #18575-page-261-to-267-of-303 (Exhibit HH))	AAFAF responses and objections, dated 8/27/2021, to requests for production of Peter C. Hein – Set 1 (excerpts)
Hein Ex. LL [previously Ex. 38]	#18760-21 (also #18575-page-268-to-272-of-303 (Exhibit II))	FOMB responses and objections, dated 8/27/2021, to requests for production of Peter C. Hein – Set 1 (excerpts)
Hein Ex. MM [previously Ex. 39]	#18760-22 (also #18575-page-273-to-278-of-303 (Exhibit JJ))	AAFAF responses and objections, dated 9/24/2021, to requests for production of Peter C. Hein – Set 2 (excerpts)
Hein Ex. NN [previously Ex. 40]	#18760-23 (also #18575-page-279-to-286-of-303 (Exhibit KK))	FOMB responses and objections, dated 9/24/2021, to requests for production of Peter C. Hein – Set 2 (excerpts)
Hein Ex. OO [previously Ex. 41]	#18760-24 (also #18575-page-287-to-295-of-303 (Exhibit LL))	AAFAF responses and objections, dated 9/27/2021, to interrogatories of Peter C. Hein – Set 1 (excerpts)

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. PP [previously Ex. 42]	#18760-25 (also #18575-page-296-to-303-of-303 (Exhibit MM))	FOMB responses and objections, dated 9/27/2021, to interrogatories of Peter C. Hein - Set 1 (excerpts)
Hein Ex. QQ [previously Ex. 43]	#18760-26 (also #18181-page-122-to-124-of-157 (Exhibit E to #18181))	June 1, 2021 press release of Puerto Rico Federal Affairs Administration
Hein Ex. RR [previously Ex. 44]	#18760-27 (also #18181-page-125-to-126-of-157 (Exhibit F to #18181))	Budget of the US Government, fiscal year 2022 (excerpts)
Hein Ex. SS [previously Ex. 45]	#18760-28 (also #18181-page-127-of-157 (Exhibit G to #18181))	July 29, 2021 press release of Puerto Rico Federal Affairs Administration
Hein Ex. TT [previously Ex. 46]	#18760-29 (also #18181-page-128-to-130-of-157 (Exhibit H to #18181))	9-15-2021 press release from office of Resident Commissioner Jennifer Gonzalez-Colón
Hein Ex. UU [previously Ex. 47]	#18760-30 (also #18181-page-131-to-134-of-157 (Exhibit I to #18181))	Report entitled “White House confirms Medicaid funding for Puerto Rico to avoid a fiscal cliff in the short term” from El Nuevo Dia
Hein Ex. VV [previously Ex. 48]	#18760-31 (also #18181-page-136-to-144-of-157 (Exhibit J to #18181))	Commonwealth of Puerto Rico basic financial statements for year ended June 30, 2018 with independent auditors report (excerpts)
Hein Ex. WW [previously Ex. 49]	#18760-32 (also #18181-page-145-to-149-of-157)	Summary of bank account balances for governmental Puerto Rico, as of July 30, 2021, dated August 31, 2021 (excerpts)
Hein Ex. XX [previously Ex. 50]	#18760-33 (also #18181-page-150-to-152-of-157 (Exhibit L to #18181))	FAFAA Puerto Rico Department of Treasury, Treasury single account, FY 2022 cash flow, as of September 3, 2021 (excerpts)
Hein Ex. YY [previously Ex. 51]	#18761-1 (also #18181-page-156-to-157-of-157 (Exhibit N to #18181))	FOMB 9/15/2021 letter to Governor Pierluisi, President of the Senate of Puerto Rico and Speaker of the House of Representatives of Puerto Rico

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. ZZ [previously Ex. 52]	#18761-2 (also #18439-page-21-to-36-of-38 (Exhibit F to #18439))	9/14/2021 notice from Morgan Stanley re CUSIP 74514LWZ6 (redacted)
Hein Ex. AAA [previously Ex. 53]	#18761-3 (also #18439-page-37-to-38-of-38 (Exhibit G to #18439))	Declaration of Mark Elliott dated October 6, 2021 [offered as declaration per #18648-page-12-of-13; not offered as exhibit]
Hein Ex. BBB [previously Ex. 54]	#18761-4 (also #18306-page-24-to-30-of-30 (Exhibit D to #18306))	9/24/2021 voluntary corporate action notice from Merrill re CUSIP 74514LB63 (redacted)
Hein Ex. CCC [previously Ex. 55]	#18761-5 (also #18237-page-16-to-31-of-35 (Exhibit A and B to #18237))	9/14/2021 notice from Merrill re CUSIP 74514LB63 (redacted) accompanied by 9-13-2021 Prime Clerk memo with list of CUSIPs
Hein Ex. DDD [previously Ex. 56]	#18761-6 (also #18237-page-32-to-35-of-35 (Exhibit C to #18237))	Screenshot of Prime Clerk website link for “noteholder solicitation materials”
Hein Ex. EEE [previously Ex. 57]	#18761-7 (also #17649-page-4-to-8-of-29 (Exhibit A to #17649))	8/2/2021 voluntary corporate action notice from Merrill regarding exchange opportunity posted in “Communications” tab of online account at Merrill (redacted)
Hein Ex. FFF [previously Ex. 58]	#18761-8 (also #17649-page-9-to-24-of-29 (Exhibit B to #17649))	Alert of EMMA filing 7/27/2021 11:00 PM, followed by notice to holders of uninsured bonds regarding exchange opportunity (posted on EMMA), followed by copy of PSA (excerpts)
Hein Ex. GGG [previously Ex. 59]	#18761-9 (also #17649-page-25-to-29-of-29 (Exhibit C to #17649))	Alert of EMMA filing 7/30/2021 5:00 PM, followed by notice to holders of uninsured bonds regarding exchange opportunity (posted on EMMA)
Hein Ex. HHH [previously Ex. 60]	#18763-1 (also #17524-page-23-to-26-of-41 (Exhibit A to #17524))	FOMB 9/27/2019 media release “Oversight Board proposes plan of adjustment to restructure Commonwealth of Puerto Rico debt and other claims”

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. III [previously Ex. 61]	#18763-2 (also #17524-page-27-to-33-of-41 (Exhibit B to #17524))	FAAFA Puerto Rico Department of the Treasury, Treasury single account, FY 2022 cash flow, as of July 9, 2021, posted on EMMA 7-21-2021 (excerpts)
Hein Ex. JJJ [previously Ex. 62]	#18763-3 (also #17524-page-37-to-41-of-41 (Exhibit D to #17524))	Summary of holdings of certain ad hoc bondholder groups referred to in FOMB opposition brief
Hein Ex. KKK [previously Ex. 63]	#18763-4 (also #16908-page-48-to-69-of-178 (Exhibit A to #16908))	Official statement for Commonwealth of Puerto Rico GO bonds, series 2009C (December 3, 2009) (excerpts)
Hein Ex. LLL [previously Ex. 64]	#18763-5 (also #16908-page-70-to-97-of-178 (Exhibit B to #16908))	Official statement for Commonwealth of Puerto Rico GO series 2012A, dated March 7, 2012 (excerpts)[This set of excerpts are more comprehensive than those in #9508-2]
Hein Ex. MMM [previously Ex. 65]	#18763-6 (also #16908-page-98-to-112-of-178 (Exhibit C to #16908))	Trading histories from Municipal Securities Rulemaking Board Electronic Municipal Market Access (“EMMA”) database for CUSIP 74514LWA1, 74514LB63
Hein Ex. NNN [previously Ex. 66]	#18763-7 (also #16908-page-113-to-120-of-178 (Exhibit E to #16908))	Employees’ Retirement System of the Government of the Commonwealth of Puerto Rico, basic financial statements and required supplementary information, June 30, 2017, with independent auditors’ report thereon (excerpts)
Hein Ex. OOO [previously Ex. 67]	#18763-8 (also #16908-page-121-to-127-of-178 (Exhibit F to #16908))	Puerto Rico Government Employees Retirement System, June 30, 2017 actuarial valuation report (excerpts)
Hein Ex. PPP [previously Ex. 68]	#18763-9 (also #16908-page-128-to-144-of-178 (Exhibit G to #16908))	Commonwealth of Puerto Rico comprehensive annual financial report year ended June 30, 2011, with independent auditors’ report dated 4-27-2012 (excerpts)
Hein Ex. QQQ [previously Ex. 69]	#18763-10 (also #16908-page-145-to-150-of-178 (Exhibit H to #16908))	Commonwealth of Puerto Rico basic financial statements and required supplementary information, FYE June 30, 2013, with independent auditors’ report dated 6-30-2014 (excerpts)

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. RRR [previously Ex. 70]	#18763-11 (also #16908-page-151-to-155-of-178 (Exhibit J to #16908))	Commonwealth of Puerto Rico basic financial statements and required supplementary information, June 30, 2017, with independent auditors' report dated 8-31-2020, preceded by 9-1-2020 EMMA filing cover sheet (excerpts)
Hein Ex. SSS [previously Ex. 71]	#18763-12 (also #16908-page-161-to-171-of-178 (Exhibit M to #16908))	Commonwealth fiscal plan dated June 29, 2018, as certified by FOMB (excerpts)
Hein Ex. TTT [previously Ex. 72]	#18763-13 (also Exhibit NN (#18647-page-17-to-32-of-35))	10/20/2021 EMMA posting of Treasury single account, FY 2022 cash flow, as of 10/8/2021 (excerpt)
Hein Ex. UUU [previously Ex. 73]	#18763-14 (also Exhibit OO (#18647-page-33-to-35-of-35))	10/21/2021 FOMB statement
Hein Ex. VVV [previously Ex. 74]	#18763-15 (also #7961-1-page-33-to-34-of-71)	Commonwealth of Puerto Rico basic financial statements, June 30, 2016, with independent auditors' report thereon (excerpts)
Hein Ex. WWW [previously Ex. 75]	#18763-16 (also #7961-1-page-56-to-66-of-71)	Contract 2018-00172 between Banco Popular and Puerto Rico Department of Treasury
Hein Ex. XXX [previously Ex. 76]	#18764-1 (also #7961-1-page-67-of-71)	Department of Treasury Circular Letter 1300-33-18
Hein Ex. YYY [previously Ex. 77]	#18764-2 (also #10029-4)	Commonwealth of Puerto Rico comprehensive annual financial report, year ended June 30, 2012, with independent auditors' report dated 9-16-2013 (excerpts)
Hein Ex. ZZZ [previously Ex. 78]	#18764-3 (also #18575-page-170-of-303 (Exhibit J to #18575))	Summary of PayGo costs produced by AAFAF

Attachment C-2 to Exhibit C

Additional exhibits offered in response and in opposition to Debtors' case or for cross examination)

Pursuant to #18394-page-4-of-15, I filed an "Exhibit List, Witness List and Identification of Previously-Filed Declarations" on Friday, October 22, 2021 (#18648) and I filed an amended exhibit list on October 25, 2021 (#18708).

Docket #18708, filed October 25, 2021, includes nine exhibits not on #18648, filed October 22, 2021. Of the nine additional exhibits listed on #18708, it appears that two exhibits (listed on #18708 as Hein Ex. 79 and 81) do not need to be offered as physical exhibits because I understand that AAFAF and FOMB have agreed that the numbers I referred to in my Objection (#18575) do appear in the specified documents in the data room that are otherwise claimed by AAFAF and FOMB to be confidential; thus, in light of such agreement, it does not appear to be necessary to deal with offering a confidential document as an exhibit that would need to be filed under seal. One exhibit (listed on #18708 as Hein Ex. 82) is publicly available on the Internet at the web location specified in #18708. Four exhibits (listed as Hein Exs. 83-86) are English versions of Puerto Rico legislation that have been produced into, and are available in, the data room, and one exhibit (listed on #18708 as Hein Ex. 80) was also produced into, and available in, the data room. The final exhibit (listed on #18708 as Hein Ex. 87) is also available in the docket at the docket entry No. specified on my exhibit list. On October 25 and 26, 2021, I supplied PDF copies of all Hein exhibits to FOMB's counsel, including these exhibits (except for the two that do not need to be physically offered), so they could be included in the binders being supplied to the Court.

These nine exhibits are listed below and seven of them will be uploaded supplementally.

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. AAAA [previously Ex. 79]		By agreement, FOMB has permitted me to use in publicly-filed papers the number for total Initial GO/PBA PSA Creditor bond claims from that confidential document (\$11.779 billion as of 2/22/2021). Accordingly, an Exhibit number has been assigned but I do not anticipate the need to offer the physical document as long as counsel agree that that is the number in the document. (DocID230822 (in data room), DS-065361 (referred to in #18575-page-52-of-303))
Hein Ex. BBBB [previously Ex. 80]	18823-1	Document identifying portion of bond claims that participated in the 7/27/2021 CUSIP exchange offer. (DocID234213, FOMB_CONF_88826 (in data room) (referred to in #18575-page-53-of-303))
Hein Ex. CCCC [previously Ex. 81]		Confidential document in data room that includes an aggregate number of \$464,591,994 uncollected from 2002 through some point in 2019. By agreement, AAFAF has permitted me to use this number in publicly-filed papers, even while claiming confidential status for the entire document. Accordingly, an Exhibit number has been assigned but I do not anticipate the need to offer the physical document as long as counsel agree that that is the number in the document. (ASSETS_2004_0002154 to 2169, at 2169, at 2169 (in data room) (referred to in #18575-page-61-of-303))
Hein Ex. DDDD [previously Ex. 82]	18823-2	PWC webpage showing Puerto Rico tax rates (https://taxsummaries.pwc.com/puerto-rico/individual/taxes-on-personal-income (referred to in #18575-page-63-of-303))

Exhibit Identifier	Docket Entry No.	Description of Exhibit
Hein Ex. EEEE [previously Ex. 83]	18823-3	Act 257-2018, English text as provided by AAFAF. (AAFAF_CONF_0008098 (in data room) (referred to in #18575-page-64-of-303))
Hein Ex. FFFF [previously Ex. 84]	18823-4	Act 60-2019, English text as provided by AAFAF. (AAFAF_CONF_0007654 (in data room) (referred to in #18575-page-64-of-303))
Hein Ex. GGGG [previously Ex. 85]	18823-5	Act 40-2020, English text as provided by AAFAF. (AAFAF_CONF_0007494 (in data room) (referred to in #18575-page-66-of-303))
Hein Ex. HHHH [previously Ex. 86]	18823-6	Act 57-2020, English text as provided by AAFAF. (AAFAF_CONF_0008326 (in data room) (referred to in #18575-page-66-of-303))
Hein Ex. IIII [previously Ex. 87]	18823-7 (also at #4606-8-page-167-to-170-of-180)	Contemporaneous report on Act 257-2018 by Reuters (#4606-8-page-167-to-170-of-180))

Certificate of Service

I, Peter C. Hein, certify that I have caused “Second Amended Pretrial Informative Motion – November 1, 2021 Pretrial Conference and November 8, 2021 Confirmation Hearing ” to be served via the Court’s CM/ECF system.

October 27, 2021

/s/ Peter C. Hein

Peter C. Hein